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1/1/2010

Marlene H. Dortch, Secretary
FCC
445 12th Street, SW
Washington, D.C. 20554

Dear Federal Communication Commission,

This letter is concerning the “LPFM proceeding”. We heard that the FCC is currently debating the continuance of processing translators from the 2003 translator auction. We have been monitoring comments made by several entities concerning a proposed “ten application processing cap”.

Portland Radio Authority is an internet radio broadcaster The PRA is a non-commercial, listener supported,online radio station. As a free form community media source, we are committed to bringing independent artistry and marginalized viewpoints into regional and international view. We aim to become a trusted source of current and historical music education, while serving as a reflection of the Portland Arts Community. We have been waiting years for the opportunity to apply for a low power radio channel to serve the Portland, Oregon community. Just recently we read Common Frequency’s comment submitted regarding the proceeding. Within the comment was a study that was hinged upon a possible outcome of the proposed “ten application processing cap”. The study showed that there would not be any decent channels to serve the core area of Portland. This is major disappointment for us.

We are discouraged that the FCC would like to slate virtually all the channels that could be used for LPFM in Portland for translators. We did our own research and found that Portland is served by fourteen translators already:

K220IN Portland OR	K240CZ Tigard OR	K274AR Gresham OR
K224CP Hazel Dell WA	K242AF Portland OR	K283BL Beaverton OR
K224DL Portland OR	K248BS Newberg OR	K288FT Portland OR
K228EU Vancouver WA	K272EL Portland OR	K296FT West Haven OR
K231AM Woodland WA	K273AI Ariel WA	

According to Common Frequency’s comment, *seven additional translators* could be awarded under the “ten application processing cap” in Portland before an LPFM window. This would allow for **21 translators to serve Portland**. Afterwards, Common

Frequency states that there is a possibility that two channels might be open for LPFM in Portland—and both channels might not be the best for serving downtown.

We think that 21 translators and one or two proposed LPFMs is not a balanced approach for dividing LPFM and translator usage. Even if the FCC decides to open a window today for LPFM, before granting translator applications from 2003, there would still be more translators serving downtown Portland than LPFMs at the end.

The FCC website states that the purpose of translator service is “to provide supplementary service to areas in which direct reception of radio service is unsatisfactory due to distance or intervening terrain barriers (e.g., a mountain).” We understand this to mean that translators provide service to areas of minimal or troubled reception, like rural areas. To provide a redundant service in an urban area is directly the opposite of what the FCC intended translator service for. The purpose of these proposed Portland translators appears to be overlooked by the FCC in relation to the original definition of a translator.

We believe that the FCC should take action to protect localism and diversity of ownership. Looking at the data, we believe that the FCC should allow community nonprofits to apply for LPFM channels before processing any more translator applications. If this does not occur, virtually all the channels will be used for translators in Portland.

Respectfully,

Holly Peters
Station Manager

cc: FCC Commissioners' Office:
Sherrese Smith, Rosemary Harold, Joshua Cinelli, Krista Witanowski, Dave Grimaldi